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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ROBERT WAGONER,
15 Defendant.
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Case No. 3:20-cr-00052-LRH-CLB

**STIPULATION TO CONTINUE
SENTENCING HEARING
(FIRST REQUEST)**

17 IT IS HEREBY STIPULATED AND AGREED by and through RENE L.
18 VALLADARES, Federal Public Defender and KATE BERRY, Assistant Federal Public
19 Defender, counsel for ROBERT WAGONER and JASON M. FRIERSON, United States
20 Attorney, and MEGAN RACHOW, Assistant United States Attorney, counsel for the UNITED
21 STATES OF AMERICA, that the Sentencing hearing set for August 16, 2022, at 1:30 PM, be
22 vacated and continued to October 4, 2022, at 1:30 PM.
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The continuance is necessary for the following reasons:

1. This is a joint request by counsel for the Government and counsel for the Defendant, Mr. Wagoner.

2. The additional time requested by this Stipulation is reasonable pursuant to Federal Rule of Criminal Procedure 32(b)(2), which states that the “court may, for good cause, change any time limits prescribed in this rule.”

3. Both counsel request this additional time in order to allow adequate time to research sentencing issues and to prepare for the sentencing hearing.

4. Mr. Wagoner is on bond and agrees to the continuance. Specifically, Mr. Wagoner was informed that the continuance will allow defense counsel to continue to gather documents in support of the hearing and provide continuity of counsel.

5. This is the first request for continuance of the sentencing hearing.

DATED this 14th day of June, 2022.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Kate Berry
KATE BERRY
Assistant Federal Public Defender
Counsel for ROBERT WAGONER

By /s Megan Rachow
MEGAN RACHOW
Assistant United States Attorney
Counsel for the Government

ORDER

Based on the Stipulation of counsel, and good cause appearing,

IT IS THEREFORE ORDERED that the Sentencing Hearing currently set for August 16, 2022, at 1:30 PM, be vacated and continued to **October 4, 2022, at 1:30 PM.**

DATED this 21st day of June, 2022.



LARRY R. HICKS
UNITED STATES DISTRICT JUDGE